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June 5, 2025

VIA U.S. MAIL

Clerk of U.S. District Court
Roman L. Hruska Federal Courthouse
111 South 18th Plaza
Suite 1152
Omaha, NE 68102

Re: United States v. Johnny Palermo, Richard Gonzalez, and Jack Olson
Case No. 4:23CR3051
and
United States v. Vincent Palermo, Johnny Palermo, and Richard Gonzalez
Case No. 4:23CR3052

Dear Sir or Madam:

Enclosed for filing, please find Motion to Change Restitution Payee in the above-referenced matters.

As you will see, the Certificate of Service has not been completed subject to your acceptance wherein we will send a completed one at your request.

Please contact the undersigned should you need anything in regard to the content of this pleading.

Very truly yours,


Howard N. Kaplan

HNK/ljs
Enclosure

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JUN 09 2025

CLERK
U.S. DISTRICT COURT

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

IN THE MATTERS OF:

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JOHNNY PALERMO,
RICHARD GONZALEZ, a/k/a "Richie",
and JACK OLSON, a/k/a "Cody Jones",

Defendants.

And

UNITED STATES OF AMERICA,

Plaintiff,

vs.

VINCENT J. PALERMO, a/k/a "Vinny",
JOHNNY PALERMO, and
RICHARD GONZALEZ, a/k/a/ "Richie",

Defendants.

4:23CR3051

4:23CR3052

MOTION TO CHANGE
RESTITUTION PAYEE

COMES NOW National Latino Peace Officers Association Omaha Chapter Foundation ("NLPOA Foundation"), by and through its undersigned attorney, and moves this Court to change the designation of the payee of the Restitution Order from its current payee, National Latino Peace Officers Association, LPOA Omaha Chapter ("NLPOA Omaha"), to National Latino Peace Officers Association Omaha Chapter Foundation. In support hereof, NLPOA Foundation hereby states as follows:

1. On or about April 19, 2023, Jack Olson, Johnny Palermo, Richard Gonzalez, and Vincent Palermo were indicted by a Federal Grand Jury in the State of Nebraska.
2. Each of these individuals eventually entered into separate plea agreements.
3. Each plea agreement required that the defendant pay some restitution to Latino Peace Officers Association ("LPOA"). It did not specifically designate whether that would be NLPOA Omaha or NLPOA Foundation.

4. Jack Olson was the chief fundraiser for NLPOA Foundation. He was charged, among other things, with conspiracy to defraud and honest services fraud against NLPOA Foundation. To the best of the knowledge and belief of the undersigned, the crimes which he was charged with had no connection with NLPOA Omaha.
5. Johnny Palermo was President of NLPOA Foundation during the time the crimes that he was charged with were committed. He was charged, among other things, of committing honest services fraud against NLPOA Foundation. To the best of the knowledge and belief of the undersigned, the crimes which he was charged with had no connection with NLPOA Omaha.
6. Richard Gonzalez was a member of NLPOA Foundation during the time the crimes that he was charged with were committed. He was charged, among other things, of committing honest services fraud against NLPOA Foundation. To the best of the knowledge and belief of the undersigned, the crimes which he was charged with had no connection with NLPOA Omaha.
7. Vincent Palermo was alleged, among other things, to have attended certain functions of NLPOA Foundation, which were paid for by NLPOA Foundation, even though he was not a member. He was also charged with committing honest services fraud against NLPOA Foundation. To the best of the knowledge and belief of the undersigned, the crimes which he was charged with had no connection with NLPOA Omaha.
8. To the best of the knowledge and belief of the undersigned, restitution payments have been made by one or more of the above individuals to NLPOA Omaha.

Simply put, none of the crimes that the above individuals were charged with, and pled guilty to, had anything to do with NLPOA Omaha. Rather, they were all committed against NLPOA Foundation. Therefore, NLPOA Foundation is the "victim" of any crimes committed by these individuals and should be entitled to any restitution paid by them.

WHEREFORE, NLPOA Foundation prays that this Court enter such orders as may be necessary to clarify that any restitution to be paid by the above-named individuals be paid to the NLPOA Foundation.

NLPOA Foundation further prays that to the extent that any restitution has been paid to NLPOA Omaha, that such monies be refunded and paid to NLPOA Foundation.

And for such further relief as the Court may deem appropriate, necessary, and equitable.

Dated on this 4th day of June, 2025.

NATIONAL LATINO PEACE OFFICERS
ASSOCIATION OMAHA CHAPTER
FOUNDATION, a/k/a "NLPOA
Foundation",

By: 

Howard N. Kaplan, #17500
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10675 Bedford Ave, Suite 201
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(402) 397-8988
Attorney for NLPOA Foundation.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing was served via U.S. Mail, postage prepaid, on this _____ day of June, 2025, to:

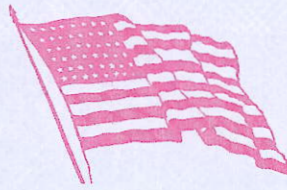
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Chapter President
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NLPOA Omaha Chapter
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CLERK
U.S. DISTRICT COURT

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